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8 ATTORNEYS FOR DEFENDANTS
9 WACHOVIA FINANCIAL SERVICES, INC.; WACHOVIA
MORTGAGE CORPORATION; WACHOVIA SHARED
10 RESOURCES, LLC (erroneously sued as Wachovia Services,
Inc.); WORLD MORTGAGE COMPANY; WACHOVIA
11 COMMERCIAL MORTGAGE, INC.; WORLD SAVINGS,
INC.; WACHOVIA EQUITY SERVICING, LLC; WACHOVIA
12 BANK, N.A.; AND WACHOVIA CORPORATION

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15

16 RONALD CHIN, individually, and on behalf of all
17 other similarly situated, and as an aggrieved
employee pursuant to the Private Attorneys General
18 Act,

19 Plaintiff,

20 vs.

21 WACHOVIA FINANCIAL SERVICES, INC.;
22 WACHOVIA MORTGAGE CORPORATION;
WACHOVIA SERVICES, INC.; WORLD
23 MORTGAGE COMPANY; WACHOVIA
COMMERCIAL MORTGAGE, INC.; WORLD
24 SAVINGS, INC.; WACHOVIA EQUITY
SERVICING, LLC; WACHOVIA BANK, N.A.;
25 WACHOVIA CORPORATION; and Does 1 through
26 10, inclusive,

27 Defendants.
28

CASE NO. 3:08-cv-01320-MMC

**STIPULATION EXTENDING
DEADLINES TO RESPOND TO
THE COMPLAINT**

Judge: Hon. Maxine M. Chesney

1 WHEREAS, Plaintiff Ronald Chin brings this action alleging employment claims,
2 and specifically alleging, *inter alia*, that Wachovia Financial Services, Inc., Wachovia Mortgage
3 Corporation, Wachovia Services, Inc., World Mortgage Company, Wachovia Commercial
4 Mortgage, Inc., World Savings, Inc., Wachovia Equity Servicing, LLC, Wachovia Bank, N.A.,
5 and Wachovia Corporation did not pay him and other current and former California hourly
6 employees wages owed for overtime compensation and wages due upon discharge or resignation,
7 did not provide them with meal and rest periods as required by law, and did not comply with
8 wage reporting requirements;

9 WHEREAS, Plaintiff Chin and his counsel have served this complaint on
10 Wachovia Financial Services, Inc., Wachovia Mortgage Corporation, Wachovia Shared
11 Resources, LLC (erroneously sued as its predecessor-in-interest Wachovia Services, Inc.), World
12 Mortgage Company, Wachovia Commercial Mortgage, Inc., World Savings, Inc., and Wachovia
13 Equity Servicing, LLC, and each of these entities' responses is currently due on or about March
14 14, 2008;

15 WHEREAS, counsel for Defendants has agreed to accept service on behalf of
16 Defendants Wachovia Bank, N.A. and Wachovia Corporation and Plaintiff is in the process of
17 effectuating this service;

18 WHEREAS, counsel have conferred and Plaintiff Chin and his counsel have
19 agreed to extend Defendants' response deadlines in this matter, and the extensions agreed upon
20 will not alter any date already set by the Court:

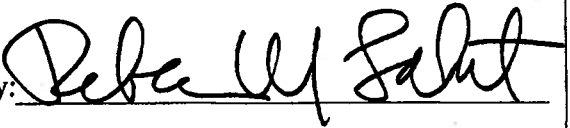
21 IT IS HEREBY STIPULATED pursuant to Civil Local Rule 6-1(a) that the
22 deadlines for Defendants Wachovia Financial Services, Inc., Wachovia Mortgage Corporation,
23 Wachovia Shared Resources, LLC, World Mortgage Company, Wachovia Commercial Mortgage,
24 Inc., World Savings, Inc., Wachovia Equity Servicing, LLC, Wachovia Bank, N.A. and
25 Wachovia Corporation to respond to the complaint are extended as follows:

- 26 1. The deadline for filing an answer to the complaint shall be April 1, 2008;
- 27 2. The deadline for filing any pre-answer motion or pleading other than an
28 answer shall be March 17, 2008.

1. The deadline for filing an answer to the complaint shall be April 1, 2008;
2. The deadline for filing any pre-answer motion or pleading other than an answer shall be March 17, 2008.

DATED: March 13, 2008

INITIATIVE LEGAL GROUP LLP
MARK YABLONOVICH
MARC PRIMO
REBECCA LABAT

By: 

Attorneys for Plaintiff
RONALD CHIN

DATED: March _____, 2008

MUNGER, TOLLES & OLSON LLP
MALCOLM A. HEINICKE
KATHLEEN M. McDOWELL
J. RAZA LAWRENCE

By: _____

Attorneys for Defendants
WACHOVIA FINANCIAL SERVICES,
WACHOVIA MORTGAGE
CORPORATION, WACHOVIA SERVICES,
INC., WORLD MORTGAGE COMPANY,
WACHOVIA COMMERCIAL MORTGAGE,
INC., WORLD SAVINGS, INC.,
WACHOVIA EQUITY SERVICING, LLC,
WACHOVIA BANK, N.A., and WACHOVIA
CORPORATION

1
2 DATED: March _____, 2008

INITIATIVE LEGAL GROUP LLP
MARK YABLONOVICH
MARC PRIMO
REBECCA LABAT

3
4
5 By: _____

6
7 Attorneys for Plaintiff
8 RONALD CHIN

9 DATED: March 14, 2008

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KATHLEEN M. McDOWELL
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10
11
12 By: /s/ Malcolm A. Heinicke

13
14 Attorneys for Defendants
15 WACHOVIA FINANCIAL SERVICES,
16 WACHOVIA MORTGAGE
17 CORPORATION, WACHOVIA SERVICES,
18 INC., WORLD MORTGAGE COMPANY,
19 WACHOVIA COMMERCIAL MORTGAGE,
20 INC., WORLD SAVINGS, INC.,
21 WACHOVIA EQUITY SERVICING, LLC,
22 WACHOVIA BANK, N.A., and WACHOVIA
23 CORPORATION
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